

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA,	:	
	:	
v.	:	Case No. 1:17-CR-00009 (TSE)
	:	
ALEXANDER K. TVERDOKHLEBOV,	:	
	:	
Defendant.	:	

**DEFENDANT’S RESPONSE TO GOVERNMENT’S SUPPLEMENT  
TO ITS APPEAL OF THE ORDER GRANTING PRETRIAL RELEASE**

COMES NOW the defendant, ALEXANDER K. TVERDOKHLEBOV (hereinafter, the defendant), by counsel, and for his response to the government’s supplement to its appeal of the order granting the defendant pretrial release in this matter he states:

Nothing has changed since the government filed its original brief in opposition to the California decision to admit the defendant to Pretrial Release, except that the amount of money found by the government has increased. In any case, that money is now in the government’s possession, making it *not more likely* that the defendant will fail to appear, *but less likely* that the defendant will fail to appear. The defendant, if he were on release, could now *not* go to Las Vegas to access that money (triggering a response from Pretrial for his unauthorized trip out of the Central District of California); nor could he remove his electronic anklet (triggering a response from Pretrial) and go to Las Vegas. The government’s suspicions that some as yet unidentified criminal associate of the defendant’s would physically travel to some as yet unidentified state to access an as yet unidentified safe deposit box in which the defendant has enough cash to purchase real



### **CERTIFICATE OF SERVICE**

I hereby certify that on the 9<sup>th</sup> day of February, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to at least the following registered ECF users:

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